

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

CAITLIN O'CONNOR,)
Plaintiff,) Case No. 3:20-cv-00628
v.) District Judge Richardson
THE LAMPO GROUP, LLC,) Magistrate Judge Frensley
Defendant.) Jury Demand
)

DEFENDANT'S UNOPPOSED MOTION TO AMEND CONFIDENTIALITY ORDER

Defendant, The Lampo Group, LLC, by and through the undersigned counsel and pursuant to Rule 26 of the Federal Rules of Civil Procedure, moves the Court to amend the Confidentiality Order in this case ([Doc. #15](#)). In support of this motion, Defendant states as follows:

1. On January 19, 2021, Defendant filed an unopposed motion to enter a Confidentiality Order (Doc. #14), citing the likelihood that this case would involve large amounts of sensitive information.
2. On January 20, 2021, the Court granted Defendant's motion and entered a Confidentiality Order (Doc. #15).
3. The Confidentiality Order allows the parties to restrict the use, disclosure, and retention of information and documents that they have designated as "Confidential."
4. Since then, Plaintiff has pursued and the Court has allowed discovery regarding highly sensitive matters that, Defendant believes, require a higher level of protection than currently available under the Confidentiality Order.

5. Defendant would like to amend the Confidentiality Order to add an “Attorney’s Eyes Only” designation that the parties can use for information and documents that are highly sensitive.
6. Defendant has attached a proposed Amended Confidentiality Order as Exhibit 1 and a comparison between it and the current Confidentiality Order as Exhibit 2.
7. The parties have conferred regarding this motion, through counsel, and Plaintiff does not oppose it.

Respectfully submitted,

/s/Daniel Crowell
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Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that, on July 9, 2021, I caused a copy of the foregoing document to be filed through the Court's CM/ECF system, which will automatically notify and send a copy of the document to:

Heather Moore Collins
Anne Bennett Hunter
Ashley Shoemaker Walter
Collins & Hunter PLLC

Attorneys for Plaintiff

/s/Daniel Crowell
Daniel Crowell (TN #31485)
Attorney for Defendant